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**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

IN RE: § **CASE NO. 20-43788-MXM-13**
ERNESTO TIJERINA AND §
FAUSTINA TIJERINA §
§
DEBTOR(S) § **CHAPTER 13**

BMO HARRIS BANK N.A. §
MOVANT § Preliminary Hearing:
vs. § Date: 2/11/2021
§ Time: 9:30 a.m.

ERNESTO TIJERINA AND §
FAUSTINA TIJERINA §
and TIMOTHY TRUMAN, TRUSTEE, §
RESPONDENTS §

**RESPONSE TO MOTION FOR RELIEF FROM AUTOMATIC STAY FILED BY BMO
HARRIS BANK, N.A.**

TO THE HONORABLE MARK X. MULLIN, US BANKRUPTCY JUDGE:

COMES NOW, ERNESTO TIJERINA AND FAUSTINA TIJERINA, Debtors in the above styled and numbered cause and files this "Response to Motion for Relief from Automatic Stay" filed on behalf of BMO HARRIS BANK, N.A., hereinafter referred to as ("Movant"), and in support hereof would respectfully show the Court as follows:

I.

Debtor is unable to admit or deny, therefore denies the allegations set forth in Paragraph 1 of Movant's Motion.

II.

Debtor is unable to admit or deny, therefore denies the allegations set forth in Paragraph 2 of Movant's Motion.

III.

Debtor is unable to admit or deny, therefore denies the allegations set forth in Paragraph 3 of Movant's Motion.

IV.

Debtor is unable to admit or deny, therefore denies the allegations set forth in Paragraph 4 of Movant's Motion.

V.

Debtor is unable to admit or deny, therefore denies the allegations set forth in Paragraph 5 of Movant's Motion.

VI.

Debtor is unable to admit or deny, therefore denies the allegations set forth in Paragraph 6 of Movant's Motion.

VII.

Debtor is unable to admit or deny, therefore denies the allegations set forth in Paragraph 7 of Movant's Motion.

VIII.

Debtor is unable to admit or deny, therefore denies the allegations set forth in Paragraph 8 of Movant's Motion.

IX.

Debtor is unable to admit or deny, therefore denies the allegations set forth in Paragraph 9 of Movant's Motion.

X.

Debtor admits the allegations set forth in Paragraph 10 of Movant's Motion.

XI.

Debtor is unable to admit or deny, therefore denies the allegations set forth in Paragraph 11 of Movant's Motion.

XII.

Debtor is unable to admit or deny, therefore denies the allegations set forth in Paragraph 12 of Movant's Motion.

XIII.

Debtor is unable to admit or deny, therefore denies the allegations set forth in Paragraph 13 of Movant's Motion.

XIV.

Debtor denies the allegations set forth in Paragraph 14 of Movant's Motion.

XV.

Debtor denies the allegations set forth in Paragraph 15 of Movant's Motion.

XVI.

Debtor denies the allegations set forth in Paragraph 16 of Movant's Motion.

XVII.

Debtor denies the allegations set forth in Paragraph 17 of Movant's Motion.

XVIII.

Debtor denies the allegations set forth in Paragraph 18 of Movant's Motion.

WHEREFORE PREMISES CONSIDERED, the Debtors pray that all relief requested by Movant be denied and for such other and further relief the Court may deem Debtors justly entitled.

/s/ Craig D. Davis
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing response was served on January 14, 2021, by and through its attorney of record, and on the TRUSTEE, Timothy Truman via Electronic Mail.

/s/ Craig D. Davis
RONALD W. ROBERTS
CRAIG D. DAVIS
JEFFREY W. ERMIS